

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

VELERON HOLDING, B.V.,

Plaintiff,

v.

BNP PARIBAS SA, *et al.*

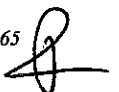
Defendants.

12 Civ. 5966 (CM)

**DECLARATION OF TREVOR COLLOP IN SUPPORT OF  
MOTION TO DISMISS FOR *FORUM NON CONVENIENS***

TREVOR COLLOP, Head of Structured Equities Trading for The Royal Bank of Scotland Group PLC, affirms the following under penalty of perjury pursuant to 28 U.S.C. §1746:

1. I am the Head of Structured Equities Trading for The Royal Bank of Scotland Group PLC, and formerly worked for ABN Amro Bank N.V. in the same role. The Royal Bank of Scotland, N.V. f/k/a ABN Amro Bank N.V. ("RBS") is a Dutch corporation headquartered in Amsterdam, Netherlands. I am a citizen and resident of the United Kingdom, where I reside and work.
2. I understand that Plaintiff Veleron Holding, B.V. has filed a complaint in the Federal District Court for the Southern District of New York against, among others, RBS (the "New York Proceeding"). I submit this affidavit in support of the Motion to Dismiss on the ground of *Forum Non Conveniens*.
3. Many of the individuals at RBS who were involved in the events that are at issue in the New York Proceeding are no longer employed at the bank. For that reason, and, on behalf of RBS, I make the statements herein on information and belief, and not my own personal



knowledge, except as to statements concerning my own personal involvement, which are specifically noted.

4. I was involved in some aspects of RBS's discussions regarding the restructuring of the Credit Agreement in the period 30 September to 2 October 2008. My involvement was in London, England. I was not aware of any others at the bank engaging in substantive such discussions from the United States.

5. On information and belief, the principal individuals from RBS involved in the negotiation of the swap confirmation at issue in the New York Proceeding or discussions regarding restructuring included (the site of their office is also stated on information and belief):

- Ekaterina Gubina; Moscow, Russia
- Jan Teun Van Efferink; Moscow, Russia
- Maria Tikhomirova; London, England
- Trevor Collop; London, England
- Gene Linetsky; London, England
- Irina Frolova; Moscow, Russia
- Stuart Bloomfield; London, England
- Anna Bacigalupi; London, England
- Geoffroy Wallier; London, England

6. On information and belief, the principal RBS documents regarding the swap confirmation and restructuring are located outside the United States.

7. On information and belief, appearance at trial in the United States would be burdensome, disruptive and costly to RBS because RBS's key witnesses and documents related to the underlying transactions are located outside the United States.



8. I submit this affidavit solely on behalf of RBS for the specific purpose of contesting the forum in this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 16, 2012 at London, England.

  
Trevor Collop